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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

AKESIS LLC,

Debtor.

Chapter 7

Case No. 15-22985/JKS

Return Date: August 18, 2015

**NOTICE OF MOTION OF CHAPTER 7
TRUSTEE TO COMPEL TURNOVER OF PROPERTY
OF THE ESTATE AND OTHER RELIEF**

TO: HON. JOHN K. SHERWOOD, U.S.B.J.
United States Bankruptcy Court
50 Walnut Street
Newark, New Jersey 07102

OFFICE OF THE U.S. TRUSTEE
One Newark Center
Suite 2100
Newark, New Jersey 07102

TD BANK
63 West Allendale Avenue
Allendale, New Jersey 07401
ATTN: Emily J. Brady, Officer

PLEASE TAKE NOTICE that on August 18, 2015, at 10:00 a.m., or as soon thereafter as
counsel may be heard, the undersigned counsel for Nancy Isaacson, Chapter 7 Trustee (the

“Trustee”), shall move before the Honorable John K. Sherwood, United States Bankruptcy Judge, at the United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey, for an Order Compelling the Turnover of Property of the Estate pursuant to 11 U.S.C. §§ 541 and 542.

PLEASE TAKE FURTHER NOTICE that the Trustee shall rely upon the Certification of Nancy Isaacson submitted in support of the within motion. Pursuant to L.B.R. 9013-2, the Trustee submits that, because the law governing the relief requested is well-steered, non-controversial and within the discretion of the Court, no brief in support of such relief is necessary.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that any responsive papers shall be filed with the Court and served upon the Trustee at Greenbaum Rowe Smith & Davis, LLP, 75 Livingston Avenue, Roseland, New Jersey 07068, so as to be received no later than August 11, 2015.

/s/ Nancy Isaacson
NANCY ISAACSON, Chapter 7 Trustee

Dated: July 24, 2015